Danner, Ward

From: Wise, Louise
Sent: Tuesday, August 26, 2014 6:40 AM
To: Scott, Jeff; Cleland-Hamnett, Wendy; Mottley, Tanya; Cunningham-HQ, Barbara
Cc: Huetteman, Tom; Armann, Steve; Johnson, Barnes; Kelley, Rosemarie; Sasseville, Sonya; Guernica, Mimi
Subject: RE: Draft priority actions for PCBs in Schools

Follow Up Flag: Follow up
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Categories: Green Category

Thanks, Jeff.

From: Scott, Jeff
Sent: Monday, August 25, 2014 4:51 PM
To: Wise, Louise; Cleland-Hamnett, Wendy; Mottley, Tanya; Cunningham-HQ, Barbara
Cc: Huetteman, Tom; Armann, Steve; Johnson, Barnes; Kelley, Rosemarie; Sasseville, Sonya; Guernica, Mimi
Subject: Draft priority actions for PCBs in Schools

Louise et al-

Per my note from late last week to Louise, here are some quick thoughts on priorities my management team and I've put together. Throughout the process we've been trying to be what I like to call "protective and practical".

For Malibu, it appears the school district has been successful at reducing any potential risks at the schools primarily through cleaning and removal of lighting fixtures and soils. It's important to note that the potential risk at Malibu looks much lower than the numbers indicate the potential for risk is in places like the New York City schools. Given the vast universe of schools and other buildings with this issue, it's certainly important we use a protective, reasonably consistent, and practical approach.

I've attached some suggestions to try to help focus our path forward.

1. Develop and share clearer policy statements on PCBs in schools. Ensure that web materials match current policy.*
2. Develop options for regulatory and statutory "fixes" to allow PCB in building materials above 50 ppm to legally remain/be managed in place when that makes sense.
3. Develop or find better scientific risk information on when it is ok to manage PCBs in building materials in place. As an example, develop ORD estimates of emission rates from lower levels of PCBs in caulk (the current study available only focused on caulk with very high PCB levels). Are emissions from caulk likely a concern at more typical concentrations?
4. Develop a detailed BMP guidance/manual that could be used by school administrators. Current agency guidance provides a limited description of practices and no detailed procedures (including worker safety and related potential EJ issues).
5. Consider options on how to fund this expanding workload within the Agency as part of FY16 budget process. At a minimum, adequate resources are not currently identified for Regions to work in this area (particularly for PCB's still "in use").

*When we refer to developing and sharing clearer EPA Policy statements it includes addressing:

- Recommendations on when to test and remove caulk.
- Dust – how should a school determine that their school is safe from contaminated dust? Clarify levels that should be used in that determination.
- Direct contact – our materials for the public frequently state that contact with PCB-containing caulk should be avoided. However, we don't state the basis for this recommendation. Is it because we are concerned that direct contact poses an unacceptable risk or is this simply a measure of prudence? Implementing this type of recommendation has many practical issues.
- Internal policy on when EPA uses CAFOs to address PCBs in caulk.
- Overall comprehensive policy/guidance on PCBs in schools that includes ballast removal, caulk and BMPs together.

I hope this is helpful. Feel free to let us know what you think and share this draft with whoever you feel is appropriate. Thanks to all for your continued efforts in this important area!

Jeff

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